

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO, EASTERN DIVISION**

ANGELA THOMPSON and	)	
BRIAN THOMPSON,	)	CIVIL COMPLAINT
	)	
Plaintiffs,	)	CASE NO. 1:18-CV-01836
	)	
v.	)	JUDGE DONALD C. NUGENT
	)	
MEDGUARD ALERT, INC.,	)	MAG. JUDGE JONATHAN D.
QUICK RESPONSE ALERT, INC.,	)	GREENBERG
and LIFEWATCH INC.	)	
	)	JURY DEMAND
Defendant.	)	

To: **OFFICE OF THE CLERK  
UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO**

**MOTION FOR CLERK'S CERTIFICATE OF DEFAULT**

In accordance with Fed. R. Civ. P. 55(a), I move that a Clerk's Certificate of Default be entered against Defendant Lifewatch Inc., for failure to plead or otherwise defend in this action as shown by the declaration of Jonathan Hilton of Hilton Parker, LLC, attorneys for Plaintiffs Angela and Brian Thompson, sworn on November 7, 2018.

Dated: November 7, 2018

By: s/ Jonathan Hilton

Jonathan Hilton (0095742)  
HILTON PARKER LLC  
10400 Blacklick-Eastern Rd NW, Suite 110  
Pickerington, OH 43147  
Tel: (614) 992-2277  
Fax: (614) 427-5557  
jhilton@hiltonparker.com

**CERTIFICATION OF SERVICE**

I, Jonathan Hilton, do hereby certify that this 7th day of November, 2018, I caused true and accurate copies of the foregoing and the associated declaration to be served via the CM/ECF system, which shall cause service upon all parties of record. I also caused service by first-class mail upon the parties listed below of the foregoing and the associated declaration.

s/ Jonathan Hilton

**SERVICE LIST**

Lifewatch Inc.  
1125 Middle Street  
Suite 201  
Middletown, CT 06457

Quick Response Alert, Inc.  
Attn: Paule Oliveri  
266 Merrick Road  
Suite #106  
Lynbrook, NY 11563